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Wednesday 2nd January 2019

To Whom It May Concern,

I was pleased to read the Competition and Market Authority's review of the funeral industry in December 2018. I believe it to be a depressingly accurate portrayal of the state of the funeral industry. I now welcome a Market Investigation Reference (MIR) in the interests of protecting the bereaved public by creating a more transparent funeral industry that's fit for purpose.

I am a progressive funeral director and the founder of Poetic Endings, a modern funeral service based in London. After an unsatisfactory experience at my Grandad's funeral, I trained to be a funeral celebrant in 2015. Before becoming a funeral director, I worked with a variety of funeral directors in London and beyond (modern, alternative and traditional). This has given me unprecedented access to the way funeral directors work, including the way the industry operates behind closed doors.

After many negative experiences, I decided the only way to address my serious concerns was to launch the funeral service I believe needs to exist, Poetic Endings. This is why I am now a funeral director, running a funeral service which has a totally different setup and approach.

I'd like to address several of the points made in your review by answering some of the original questions posed in the summer of 2018. I'd also like to present a more hopeful state of affairs by describing how Poetic Endings operates and the different behaviour displayed by the consumers who appoint us.

Why have funeral prices generally increased?

1. Traditionally consumers have not shopped around or asked questions. So some funeral directors have continuously increased prices way beyond the rate of inflation, as identified in the CMA review.
2. The funeral industry is reluctant to publish prices online in a clear and transparent way, making it difficult for the public to easily compare services. Certain funeral services have taken advantage of the lack of transparency to continue increasing prices.
3. This has set a precedent for other funeral directors to follow. It is not just the three big corporate companies who have been charging high prices. There are also large independents who have been inspired by the corporate companies and will also not list their prices online.
4. The greed of the aforementioned funeral directors, whose primary concern is increasing profits.



Poetic Endings Ltd. Company Registration No: 11213694.

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What explains certain large funeral price differences between funeral directors in the same local area?

1. The presence of corporate funeral directors whose strategy has been to price funerals at the highest possible price possible for the area. It's well known in the industry that going to a different branch of the same company could save a client hundreds, if not thousands, of pounds. This also explains the reluctance of certain funeral companies to put their prices online or to send out price lists by email.
2. The public's historical lack of interest in engaging with matters relating to death, dying and funerals, which has allowed this situation to develop.

In what settings and under what circumstances do consumers decide which funeral director to contact?

Reassuringly, there is a new kind of funeral consumer, very different to the typical consumer identified in the CMA report. This new kind of consumer is choosing progressive funeral services like Poetic Endings in London, Full Circle Funerals in Leeds and Albany Funerals in Kent.

Poetic Endings' clients find us in three ways:

1. Online
Most consumers find Poetic Endings by researching options online because they aren't prepared to just go to their local high street funeral director. Most of the clients we deal with are tech savvy and expect to see an excellent website with information, options and prices as standard. Many clients mention how impressed they were with our website and cite this when explaining why they choose to appoint us as opposed to another funeral director.
2. Recommendation
Either personal recommendation due to our reputation, or through an independent resource such as the Good Funeral Guide.
3. Dissatisfactory experiences with another funeral service
Many of our clients have had poor experiences arranging a funeral with another funeral service. Some originally appoint a more traditional funeral director to take care of the person who has died and subsequently change to Poetic Endings. It's becoming increasingly common for consumers to change funeral directors because of dissatisfactory funeral experiences and the lack of transparency over service, quality and price.



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What factors are important to them in making that choice? How far (in terms of distance / time) are consumers prepared to travel to reach a funeral director? Do consumers have sufficient information on the alternative funeral directors available locally?

We are not a local funeral director. We cover all of Greater London and beyond. Clients choose us because of our approach, rather than our locality. Our business is successful because there are insufficient alternatives to traditional funeral directors available in most areas of London.

Our clients value our:

- Modern approach
- Transparency regarding prices and services
- Flexibility
- Emotional intelligence
- Reasonable prices
- Creativity and imagination
- Website

Is sufficient information (including low cost funeral options and itemised prices) made available by funeral directors, when it is provided and does it allow for meaningful comparisons of services between funeral directors?

Generally, no.

Our website is unusual in that it clearly displays a full list of the services we offer, how we work and how much everything costs, in an easy-to-understand and accessible format.

<https://www.poetic-endings.com/how-it-works-and-costs/>

How do consumers evaluate non-price factors, such as quality?

Reassuringly, Poetic Endings' clients show a more enlightened and empowered approach to choosing a funeral director. They will research, ask questions and make sure they feel comfortable about the decisions they're making.

What are the benefits or limitations of intermediaries, such as comparison websites, in helping people choose a funeral director?

Very limited. Most of the comparison websites compare only on price, rather than quality or suitability of service, and take a high commission from funeral directors' fees.



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How effective are industry codes of practice in facilitating consumer choice e.g. through transparency obligations placed on funeral directors?

100% ineffective. The trade associations have not made it obligatory for funeral directors to put their prices online, nor have I seen much evidence of members being held to account for exploiting the bereaved public.

How do funeral directors compete to attract customers?

Poetic Endings is not involved with traditional advertising methods popular with other funeral directors (for example bereavement guides, local newspapers, doctors' surgery advertisements).

Our success is due to being the kind of business that progressive consumers of today, and therefore consumers of the future wish to engage with.

What, if any, barriers exist to funeral directors entering a new local area?

Historically, the cost of setting up a funeral service was high due to paying high street rents, purchasing fleets of cars and needing expensive equipment.

There are now modern and creative businesses setting up all over the UK (like Poetic Endings) who are finding creative ways to operate without huge startup costs. Shared mortuary spaces, hiring vehicles only when required and not having high street premises means the savings can be passed onto consumers, as well as a more creative and flexible service.

Could funeral directors providing enhanced online information enable effective comparisons, and if so, what information should they provide?

Yes. Funeral directors should list all of their services and prices online. No exceptions.

Are there other ways to improve transparency of information that we should consider?

Demand the following from every funeral director in the UK:

- *Cost*
Display a clear and easy-to-understand price list showing all services online.
- *Services*
Use clear language to explain the services offered. i.e. no describing embalming as hygienic treatment.
- *Ownership*
Clearly show who the company is owned by. Dignity, Funeral Partners and large



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independents hide behind the names of trusted family companies they purchased years ago. This must be stopped as it's dishonest.

Are there measures that could help consumers evaluate non-price factors, such as quality, together with prices?

Encourage the public to use independent websites such as the Good Funeral Guide.

Are there technological or innovative solutions that could help consumers make more informed choices?

It's very simple.

1. Open up the market (the MIR is a positive first step) then encourage modern, progressive and innovative funeral services to set up. Introduce gentle but firm regulation to allow these creative businesses to thrive whilst adhering to strict standards.
2. Hold those responsible for the current state of affairs to account. Do not let them be the regulators of the industry.
3. Sanction those who refuse to behave transparently including trade associations.

Thank you for taking the time to write the comprehensive review and to consider my response.

I confirm that I welcome a full Market Investigation Reference (MIR) of the funeral industry in the interests of protecting the bereaved public and creating a fair, transparent, empathetic, collaborative, flexible, strong, courageous and resilient funeral industry fit for 2019 and beyond.

Yours faithfully,

Louise Winter
Progressive Funeral Director & Founder
Poetic Endings



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